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May 9, 2019

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Updating the Intercarrier Compensation Regime to Eliminate Access Arbitrage,  
WC Docket No. 18-155

Dear Ms. Dortch:

On May 7, 2019, on behalf of CenturyLink, I met with Susan Bahr, Allison Baker, Lynne Engledow, Lisa Hone, John Hunter, Al Lewis, Erik Raven-Hansen, Gil Strobel, and Shane Taylor of the Wireline Competition Bureau; and Eric Burger, Octavian Carare, and Eric Ralph of the Office of Economics and Analytics, to discuss CenturyLink's April 30, 2019 submission in this proceeding.<sup>1</sup> I also referenced CenturyLink's analysis of the legal authority under which the Commission could adopt the reforms CenturyLink has recommended.<sup>2</sup> The discussion was consistent with those filings.

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<sup>1</sup> Letter from Joseph C. Cavender, CenturyLink, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-155 (filed Apr. 30, 2019).

<sup>2</sup> See Comments of CenturyLink, WC Docket No. 18-155, at 14-18 (filed July 20, 2018); Letter from Timothy M. Boucher, CenturyLink, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 01-92, et al., at 3-6 (filed May 21, 2018).

Marlene H. Dortch

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Please contact me if you have any questions regarding this matter.

Respectfully submitted,

Joseph C. Cavender

cc: Susan Bahr  
Allison Baker  
Eric Burger  
Octavian Carare  
Lynne Engledow  
Lisa Hone  
John Hunter  
Al Lewis  
Eric Ralph  
Erik Raven-Hansen  
Gil Strobel  
Shane Taylor